

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

At the end of each program year, the City of Covington is required to prepare a Consolidated Annual Performance Evaluation Report (CAPER) which includes information on the programmatic accomplishments resulting from the City's use of Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds. This CAPER covers the period of July 1, 2019- June 30, 2020 (Program Year 2019).

Over the past program year, the City of Covington pursued the goals and objectives outlined in the Program Year (PY) 2019 Annual Action Plan and the PY 2013-20 Consolidated Plan. Below is a summary of program year accomplishments:

- Completed 9 homeowner rehabs through the City's housing rehab programs. These programs addressed urgent home repair needs for very-low and low-income homeowners, giving priority to elderly, disabled and veteran households. 12 additional rehabs are currently underway and will occur in PY 2020.
- Substantially completed 13 Upper Floor Residential Rent rehab units. Construction on 3 additional units has started and will be completed in PY 2020. This program creates new affordable rental units in previously vacant upper floor space of mixed-use buildings.
- The City completed 3 CHDO rehabs for homeownership in the HOME Consortium using HOME funds. CHDO rehabs are partnerships between the City and non-profit housing developers. These projects will create new homeownership opportunities for low-income families. 2 new CHDO homeownership projects were approved and will begin construction in early PY 2020.
- The Homebuyer Assistance Program created 73 new low-income homeowners by providing deferred/forgivable loans to cover lender required down payment and closing costs. This program continues to be widely utilized in all of the HOME Consortium cities.
- Many public improvements occurred including: street resurfacing and installation of ADA compliant sidewalk ramps in the Central Business District and Old Town/Mutter Gottes neighborhood, bridge design work in the Botany Hills neighborhood, streetscape improvements in the Central Business District and Lewisburg neighborhood, and park facility improvements to Annie Hargraves Park in the Seminary Square neighborhood and Barb Cook Park in Latonia.
- The City continued to implement crime prevention efforts and community policing in targeted high crime areas and in targeted public housing complexes.
- The City coordinated increased code enforcement efforts with other public investments in the Latonia neighborhood.

- The City offered recreational and educational programs to residents at City park facilities.
- The City continued its popular and highly successful early childhood literacy program for Covington families.
- The City provided technical assistance to existing local businesses through the Micro-Enterprise Assistance Program.
- The City provided loans for the expansion of two local businesses utilizing its \$4 million Section 108 Economic Development Loan Pool that was awarded in 2014. These business expansions will create new job opportunities for low-income residents.
- The Department continued to implement strategies to address the Analysis of Impediments to Fair Housing Choice (AI). The AI serves as our basis for fair housing planning, and provides essential information in building public support for fair housing efforts.

These accomplishments furthered the goals established in our strategic plans. The City will continue to be diligent to further promote these goals in future program years.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Business 1st Grant Program	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	10	0	0.00%			
Business 1st Grant Program	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	15	0	0.00%			
Business Development Staff	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	0	0		100	0	0.00%

CDBG Administration	Affordable Housing Public Housing Homeless Non- Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		50000	23515	47.03%
CDBG Administration	Affordable Housing Public Housing Homeless Non- Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		40640	42515	104.61%

CDBG Administration	Affordable Housing Public Housing Homeless Non- Homeless Special Needs Non-Housing Community Development	CDBG: \$	Rental units rehabilitated	Household Housing Unit	0	0		20	16	80.00%
CDBG Administration	Affordable Housing Public Housing Homeless Non- Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	0		42	21	50.00%

CDBG Administration	Affordable Housing Public Housing Homeless Non- Homeless Special Needs Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	0	0		100	0	0.00%
CDBG Administration	Affordable Housing Public Housing Homeless Non- Homeless Special Needs Non-Housing Community Development	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	0	0		300	739	246.33%

CDBG Program Staff	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Program Staff	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		25000	42515	170.06%
CDBG Program Staff	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Program Staff	CDBG: \$	Rental units rehabilitated	Household Housing Unit	0	0		20	16	80.00%

CDBG Program Staff	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Program Staff	CDBG: \$	Homeowner Housing Added	Household Housing Unit	0	0		10	3	30.00%
CDBG Program Staff	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Program Staff	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	0		42	21	50.00%

CDBG Program Staff	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Program Staff	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	0	0		90	73	81.11%
Code Enforcement Hardship Rehab/Repair	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Homeowner Housing Added	Household Housing Unit	75	0	0.00%			
Code Enforcement Hardship Rehab/Repair	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	8		32	21	65.63%
Code Enforcement Staff	Affordable Housing Non-Housing Community Development	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	15827	0	0.00%	300	739	246.33%

Covington CHDO Development Projects	Affordable Housing	HOME: \$	Homeowner Housing Added	Household Housing Unit	5	1	20.00%	10	3	30.00%
Covington Homebuyer Assistance Program	Affordable Housing	HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	70	0	0.00%			
Crime Prevention	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	6895	42515	616.61%	40640	42515	104.61%
HOME Administration	Affordable Housing	HOME: \$	Homeowner Housing Added	Household Housing Unit	0	0		10	3	30.00%
HOME Administration	Affordable Housing	HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	0	0		90	73	81.11%
Interim Assistance	Affordable Housing Non-Housing Community Development	CDBG: \$	Other	Other	100	0	0.00%			
NKY HOME Consortium CHDO Development Projects	Affordable Housing	HOME: \$	Homeowner Housing Added	Household Housing Unit	5	0	0.00%			

NKY HOME Consortium Homebuyer Assistance Program	Affordable Housing	HOME: \$	Homeowner Housing Added	Household Housing Unit	0	66		0	0	
NKY HOME Consortium Homebuyer Assistance Program	Affordable Housing	HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	100	0	0.00%	90	73	81.11%
Place Matters	Affordable Housing Non-Housing Community Development	CDBG: \$	Homeowner Housing Added	Household Housing Unit	5	0	0.00%			
Public Facilities Senior Center	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	6166	0	0.00%			
Recreation Programs	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	29828	42515	142.53%	1000	33560	3,356.00%
Relocation	Affordable Housing	CDBG: \$	Other	Other	10	0	0.00%	3	0	0.00%

Section 108 ED Loan pool	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	25	0	0.00%			
Section 108 Hope VI Repayment	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	40640	0	0.00%			
Streets, Playgrounds, Greenspace	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	56825		30000	23515	78.38%
Streets, Playgrounds, Greenspace	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	29828	0	0.00%			
Upper Floor Residential Rent Rehab Program	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	15	0	0.00%	20	16	80.00%
Upper Floor Residential Rent Rehab Program	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	0		0	0	

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan,

giving special attention to the highest priority activities identified.

The City utilized CDBG and HOME funds to meet the overall goals of these HUD programs while also meeting specific goals set forth in our strategic plan. The highest priority goals and activities include: expansion of homeownership opportunities; financial assistance to low-income homeowners with home repair needs; expansion and preservation of affordable housing opportunities for homeownership and rental; maintaining the City's commitment to historic preservation; expansion of economic opportunities and support of local businesses; improving public spaces and living environments through park and infrastructure investments and code enforcement.

The City addressed these goals by: providing 73 homebuyer assistance loans to low-income homebuyers; 21 loans to low-income homeowners to address home repair needs prioritizing assistance to elderly, disabled and veteran households; working with CHDO's to create 3 new affordable homeownership units; creating 16 new affordable rental units; prioritizing historic preservation in all development efforts; providing technical assistance to -- existing businesses to promote retention and expansion; completing street improvement projects and park facility upgrades; expanding targeted code enforcement efforts.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG	HOME
White	12	67
Black or African American	9	8
Asian	0	1
American Indian or American Native	0	0
Native Hawaiian or Other Pacific Islander	0	0
Total	21	76
Hispanic	1	1
Not Hispanic	20	75

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

The City broadly markets CDBG and HOME programs to encourage increased minority participation. CHDO's are required to utilize Affirmative Marketing plans to sell/lease HOME assisted housing development. City staff attends public events such as the Senior Expo, Veterans Fair and the Old Timers Celebration which attract minority, elderly and veteran populations. The City has partnered with the Human Rights Commission to market CDBG home repair programs to underserved populations. 9 of 21 CDBG home repair program loans were awarded to African American households, 1 to Hispanic households. 6 of 75 homebuyer loans were awarded to African American households, 1 to Hispanic households.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	2,619,787	2,105,393
HOME	public - federal	1,389,256	555,878

Table 3 - Resources Made Available

Narrative

CDBG funds were utilized in multiple neighborhoods throughout the City. Street resurfacing, sidewalk improvements, ADA sidewalk ramp installations, and park improvements occurred in the Central Business District, Botany Hills, Seminary Square, and Latonia neighborhoods. Code enforcement also occurred in the Latonia neighborhood to address other deteriorating factors.

Crime prevention activities were targeted to high crime areas and the City Heights Public Housing Complex. These areas are identified by the Police Department as areas of focused crime prevention efforts.

The Upper Floor Residential Rehab Program is a rental rehab program that is available citywide to create new affordable rental units.

Homeowner rehabilitation activities occurred throughout the City. These programs are targeted to elderly, disabled and veteran households, not targeted geographically.

There were multiple activities that occurred city-wide serving low-mod income areas including economic development technical assistance efforts, recreation programs and early childhood literacy programs offered citywide and at multiple City park and aquatic facilities.

HOME funds are not targeted geographically. HOME homebuyer assistance programs are available city-wide in the HOME Consortium cities of Ludlow, Covington, Newport, Bellevue and Dayton. HOME CHDO Housing Development occurred in Covington and the HOME Consortium city of Newport.

Maps are attached showing the geographic distribution of CDBG and HOME funds.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description

Table 4 – Identify the geographic distribution and location of investments

Narrative

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

CDBG and HOME funds leveraged, private, state and local funds in the following amounts:

CDBG:

- Street improvement projects leveraged \$1,440,574 in Capital funds/SNK Funds
- Crime Prevention activities leveraged \$50,000 in funds from the Housing Authority of Covington
- Housing Development activities leveraged \$280,000 in owner contributions

HOME:

- Homebuyer Assistance Programs leveraged \$7,731,006 in private mortgage funds and buyer contributions
- Homebuyer Assistance Programs leveraged \$10,801 in matching down payment funds

The City met HOME matching requirements with excess match from the prior Federal fiscal year and other eligible sources of match.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	561,140
2. Match contributed during current Federal fiscal year	12,476
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	573,616
4. Match liability for current Federal fiscal year	30,776
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	542,839

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
5027	06/30/2019	0	0	0	0	2,035	0	0
5171	06/30/2019	0	0	0	0	10,441	0	0

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
0	0	0	0	0

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	0	0	0			
Number	0	0	0			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	152	113
Number of Special-Needs households to be provided affordable housing units	0	0
Total	152	113

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	30	19
Number of households supported through Rehab of Existing Units	32	21
Number of households supported through Acquisition of Existing Units	90	73
Total	152	113

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The City did not meet its goals for providing affordable housing. Most of the shortfall is due to projects not being completed yet. Projects were also delayed due to challenges faced by staff from the COVID-19 pandemic. Staff was relegated to working from home for much of 2020, which created delays in processing applications and working with contractors. The goal was to create 20 new units of affordable rental housing. Only 16 units were created. However, there are 2 new rental units set to begin. The goal was to create 10 new units for affordable homeownership. Only 3 were completed. However,

three units are underway and the City is working with CHDO's to identify new units for PY 2020. The goal was to rehab 32 existing units and 21 were completed or are substantially complete. The City will increase marketing efforts for home repair programs to ensure that the need is being met. The goal for the acquisition of existing units for affordable housing was basically met with 73 purchased through the homebuyer assistance program out of a goal of 90.

CDBG funds were also utilized to pay matching expenses for the Lead Hazard Reduction Program. This program is currently removing lead hazards from 10 low-income owner-occupied or rental housing units.

Discuss how these outcomes will impact future annual action plans.

There continues to be a major need for affordable housing opportunities in the City. There is also an aging housing stock, many owned by low-income homeowners, that needs to be preserved and to remain affordable. The City will continue to allocate substantial funding for the creation and preservation of affordable housing in future planning.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	6	3
Low-income	9	5
Moderate-income	6	68
Total	21	76

Table 13 – Number of Households Served

Narrative Information

Number of persons served through CDBG programs: Homeowner Rehab: 6 extremely low-income, 9 low-income and 6 moderate-income households.

Number of persons served through HOME homeownership programs: 3 extremely low-income, 5 low-income and 68 moderate-income.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City supported the Continuum of Care and the local agencies that offer homeless support services. These agencies include Welcome House of Northern KY, NorthKey, Transitions, Inc. and the Center for Independent Living Options. The City provided support and technical assistance to these agencies to address homelessness.

These agencies administered multiple programs that addressed the needs of the homeless population. Welcome House administered the Gaining Access Through Programs and Support (GAPS) program which assists homeless individuals and families to connect with assistance programs and housing. Welcome House administered the CoC region's coordinated entry process, whereby individuals experiencing homelessness are systematically assessed and prioritized according to need for housing and services. The assessment tool being used is the Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT).

Transitions, Inc. managed the Permanent Housing Program which identified needs and connected the homeless population to support programs and housing assistance.

Center for Independent Living Options administered the Permanent Supportive housing Program, a long-term housing assistance program which provided monthly rental assistance and supportive services to eligible participants.

This region has also expanded and is now coordinating street outreach projects which assists with locating individuals experiencing homelessness who may not come into agencies for services. These services were offered in the 8 counties of the Northern Kentucky Area Development District.

Addressing the emergency shelter and transitional housing needs of homeless persons

Transitions, Inc. operated programs that provide transitional housing with intensive case management, outreach, employment services, psychiatric nursing services, mental health case management, and life skills assistance.

Welcome House's GAPS program worked with homeless individuals and families to address their transitional housing needs while also working with them on permanent housing solutions.

The NKY Emergency Cold Shelter operated an emergency shelter during cold weather months to those

in need.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Agencies in the Region III Continuum of Care worked to reduce homelessness and created programs to prevent homelessness. Agencies that administered programs to assist individuals and families to avoid becoming homeless include NorthKey, Welcome House of Northern KY and Transitions, Inc. The City supported these efforts.

The City is also allocating a portion of funds received through its CARES Act allocation to work with homeless service providers to address increased homelessness caused by the COVID-19 pandemic. Funds will be awarded for homeless programs in PY 2020.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Permanent housing for the homeless continued to be a top priority for this region. The City supported the efforts of the Continuum of Care and the local agencies that addressed these needs. These agencies included Welcome House of Northern KY, NorthKey, the Center for Independent Living Options and Transitions, Inc.

These agencies administered multiple programs to assist homeless individuals make the transition to permanent housing and independent living. These programs included:

- Center for Independent Living-Housing for Persons with Disabilities: supportive housing program utilizing scattered site units and providing support services for homeless individuals with disabilities
- Transitions, Inc.-Permanent Housing Program: combined four previous housing programs operated by Transitions, Inc.; provided homeless services and case management to homeless individuals at 4 project sites; provided direct assistance to 36 homeless individuals and families
- Welcome House-Rapid Re-Housing Projects: Tenant Based Rental Assistance programs with supportive services focusing on moving homeless families with children to permanent housing

- Welcome House- GAPS: program utilized a Housing First approach; focused on moving participants from emergency shelters into permanent housing

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

Public housing needs were addressed in Program Year 2019 by the Housing Authority of Covington and the City of Covington through the Community Housing Resource Group, a joint effort formed through a Consortium between the City of Covington and the Housing Authority of Covington. This Consortium administered public housing units, rehabilitation/modernization activities and home ownership opportunity programs as well as administering the Housing Choice Voucher Program which assisted very low-income families, the elderly and disabled to afford decent, safe and sanitary housing in the private market.

The Housing Choice Voucher Program addressed the needs of public housing by providing detailed briefing sessions to Program applicants. In Program Year 2019, --- applicants attended a Housing Choice Voucher briefing session. At this meeting, families learned about fair housing, the portability process and were encouraged to move out of poverty concentration areas.

At the briefing, the Family Self-Sufficiency Coordinator presented info on the FSS Program. Interested applicants meet with the FSS Coordinator after being admitted to the Voucher program.

Each quarter during the year, families who claim zero or minimal income attended information meetings where speakers covered topics such as education, financial literacy, becoming business owners, childcare benefits and other self-sufficiency topics.

City staff, housing authority staff and Housing Choice Voucher staff attended public events to promote public housing availability and programs.

HCV staff continued to try to recruit new landlords to the Program to increase the availability and choice of units.

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

The Resident Services Department of the Covington Housing Authority provided leadership and program support for Covington Public Housing programs. The objectives of the Resident Services Department are to provide quality programming, as well as resources, to low income families to address the barriers to economic self-sufficiency. The Resident Services Department coordinated the Resident Advisory Board as well as programs for adult education, youth programming and elderly services.

- Adult education programs offered included: GED preparatory classes; academic and computer enrichment classes; and employment readiness through classes that promote personal responsibility, and links to job search services
- Youth programming included: after-school programs; summer camp programs; and work

- readiness and work experience through summer youth employment programs
- Elderly services included: free congregate meals, as well as educational and recreational opportunities, to low income senior citizens

The Resident Services Department collaborated with many community organizations to serve the public housing resident population.

The Housing Choice Voucher Program administered a Family Self-Sufficiency (FSS) Program to assist program families to work towards economic self-sufficiency. FSS rewards participants who increase their income through employment by matching rental increases in an Individual Development Account that participants can access upon achieving program goals. The Housing Choice Voucher Program also administered a Section 8 to Homeownership Program. This program allows Section 8 families to use their Housing Choice Vouchers towards the purchase of a home rather than rent. The FSS Program currently has -- participants. 19 families have purchased homes through the Section 8 to Homeownership since the program's inception.

Actions taken to provide assistance to troubled PHAs

The PHA is not designated as troubled.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The City of Covington completed an entire re-write of the City's current zoning ordinances. There were provisions in the previous zoning code that had negative effects on affordable housing development. Factors existed that were modified to be less onerous to development included: density limitations; rules on infill housing development; allowances for duplexes in certain areas; allowing additional units to be added to single-family residences; allowing accessory structures i.e. carriage houses; and simplification of complex local historic preservation guidelines.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

Obstacles to meet underserved needs included: the lack of adequate financial resources, the need for increased supportive services, the increasing cost of housing, the need to expand economic opportunities, the need to coordinate resources, and the need to inform households of available services.

The lack of adequate financial resources continued to be the main obstacle facing the City and other local organizations in meeting underserved needs. The City assisted local agencies to seek out other sources of funds, both public and private. The City offered technical assistance to providers in their pursuit of other federal, state, or private funding sources. The City also utilized a full-time grant writer to pursue additional funding sources through the public and private sectors and foundations.

To address housing affordability, the City continued to focus HOME and CDBG funding into programs to promote affordable homeownership, low-income homeowner rehabilitation, and the creation of new affordable homeownership and rental units.

CDBG funds were utilized for micro-enterprise assistance programs in an effort to expand economic opportunities in areas where low-mod jobs are made available. Two economic development projects were funded with the Section 108 Economic Development loan pool which will expand economic opportunities.

The City continued to support non-profit partners, the Covington Housing Authority, homeless providers, and other special needs groups in their goal to meet the underserved persons of the community. The City utilized the outreach of these agencies to inform households in the underserved population of available city programs and services.

To address underserved needs, all CDBG and HOME investments for program year 2019-20, directly

benefited low/mod income residents.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

To reduce lead-based paint hazards, the City took the following actions related to our adopted Lead Based Paint Policy for all homes that were built 1978 or before:

Homebuyer Program - Identify and stabilize deteriorated paint thru Notification, Visual Assessment, Paint Stabilization utilizing Safe work practices and obtaining Clearance when work is completed by a contractor with RRP certification.

Rehabilitation Programs/Housing Development - 1) rehab costs \$0-\$5,000 Do no harm thru Notification, Presuming lead-based paint, Use safe work practices on all surfaces and obtaining Clearance when work is complete by a contractor with RRP certification. 2) \$5,000 - \$25,000 Identify and control lead hazards thru Notification, Presuming lead-based paint, Use standard treatments and obtaining Clearance when work is complete by a Contractor with RRP certification. 3) over \$25,000 Identify and abate lead hazards thru Notification, Paint Testing and Risk Assessment, Abatement and obtaining Clearance when work is complete by a licensed Lead Abatement Contractor.

The City was also began to implement its Lead Hazard Reduction Program with grant funds awarded by the Office of Lead Hazard Control and Healthy Homes. 2 units were completed and 6 are being evaluated for lead hazards. This grant will allow the City to create approximately 60 lead safe housing units by addressing lead based paint hazards in low-income housing. This program is targeted to households with children under six years of age.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

Programs funded with CDBG and HOME provided homeowner rehabilitation and repairs, redevelopment of rental and homeowner units for affordable housing and down payment assistance for income-eligible homebuyers. These activities, that produced and preserved affordable housing, were important in reducing the number of poverty-level families in the city. Using CDBG funding, city programs also supported activities that provided public services and recreational activities.

Housing Choice Voucher (HCV) agencies in Kenton and Campbell Counties administered Family Self-Sufficiency Programs and Section 8 to Homeownership Programs to guide HCV families on a path of financial stability.

The city implemented the federally required Section 3 program, where applicable, to ensure that employment or contracting opportunities generated by HUD funded projects give preference to qualified low- and very-low income persons or business concerns.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

CDBG and HOME funds were administered through the Neighborhood Services Department. The Department oversees the management and expenditure of these funds with assistance from the City's Finance Department. Functions of the department include planning and policy-making, program administration, management of grants/loans and monitoring. The department also manages the implementation of all activities funded by the CDBG and HOME Programs.

The City of Covington is a HOME participation jurisdiction and is the lead entity of the Northern Kentucky HOME Consortium. The Consortium includes Covington and the cities of Ludlow, Newport, Bellevue and Dayton. There is a Governing Board with one representative from each municipality serving as a voting member. This representative is the Mayor or his/her designee. This Board establishes all policies and procedures, determines funding allocations, controls all activities and will instruct Covington during implementation of the program in accordance with the Bylaws. Covington, as the lead entity, ultimately approves all funding decisions.

There is also an extensive structure of other agencies, non-profit and for-profit developers, educational institutions, neighborhood and community organizations, non-profit funders, affordable housing developers, business, economic development and workforce development organizations, lenders, private funders and healthcare providers that work towards implementing the goals of the Consolidated Plan.

All CDBG and HOME programs and activities were monitored internally and externally to ensure program effectiveness and efficiency. All individual activity files are monitored by the Community Development Manager to ensure compliance with all program rules and regulations. This included homeowner rehab programs, homebuyer programs, recreation programs, public facilities and improvements, business assistance programs, crime prevention efforts, code enforcement and any other activities funded in whole or in part with HOME or CDBG. An onsite monitoring schedule was created for all external monitoring requirements i.e. CHDO annual monitoring and past projects funded with CDBG or HOME that require ongoing monitoring. External monitoring will be conducted by the Community Development Manager and/or the CDBG-HOME Program Coordinator. No CDBG or HOME funds were released for any project or activity without prior review by the Community Development Manager.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The City maintained a cooperative relationship with the following community based organizations: Covington Neighborhood Collaborative, Center for Great Neighborhoods, Housing Opportunities of Northern Kentucky, Entryway, the United Way, the Catalytic Development Fund of Northern Kentucky, the Life Learning Center, Catholic Charities of Northern Kentucky, The Brighton Center, The Welcome House, Covington Human Rights Commission, real estate professionals and lenders.

These collaborative efforts included: meeting with neighborhood groups; coordinating affordable

housing initiatives with CHDO partners in the HOME Consortium, local housing counseling agencies, realtors and lenders; and consultations with the Human Rights Commission.

The City also collaborated with these agencies and the Northern KY Health Department to implement the Lead Hazard Reduction Program. The City partnered with the agencies, and the NKY Health Department in particular, to identify families to assist with lead hazard reduction activities.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The City's Analysis of Impediments to Fair Housing Choice identified the following impediments: Isolation due to affordability issues; Ability of low-income households to purchase housing; Foreclosures due to predatory lending in low-income census tracts; Public awareness; Physical accessibility; Discrimination due to race, ethnicity, gender, disability. In PY 2019, the City completed the following actions related to these identified impediments:

- Continued to offer the Homebuyer Assistance Program to spur affordable homeownership
- Coordinated marketing efforts for affordable homeownership programs with realtors, lenders, and housing counseling agencies
- Marketed affordable housing programs at events attended by minority, elderly, disabled and veteran populations
- Marketed credited counseling and financial literacy programs offered by local counseling agencies
- Worked with CHDO partners to create new affordable housing opportunities
- Referred troubled homeowners to local foreclosure and loss mitigation counseling agencies
- Required homebuyer education classes for all Homebuyer Assistance Program participants
- Marketed units financed through City efforts to groups least likely to apply for assistance by working through entities that work with minority and disabled populations
- Informed and educated landlords about fair housing through outreach efforts including trainings, mailings, e-blasts, etc.
- Utilized CDBG funds to install handicapped accessible sidewalk ramps
- City staff Participated in the Annual Pride Parade

Strictly adhered to the City's anti-discrimination and promoting diversity policies.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

All CDBG and HOME activities were monitored annually by the Community Development Manager, with assistance from the CDBG/HOME Coordinator, to ensure compliance with all program rules and regulations. An onsite monitoring schedule was created for all external monitoring requirements i.e. CHDO annual monitoring and past projects funded with CDBG or HOME that require ongoing monitoring. External monitoring was conducted by the Community Development Manager, with assistance from the CDBG/HOME Coordinator. No CDBG or HOME funds were released for any project or activity without prior review by the Community Development Manager.

- CDBG/HOME program participant files: all files related to CDBG and HOME homeowner rehab and homebuyer activities were reviewed by the Community Development Manager, with assistance from the CDBG/HOME Coordinator, prior to the commitment of funds. This review included applicant eligibility, property qualification, underwriting, subsidy layering, appropriate use of funds, costs reasonableness, environmental review requirements, construction documents, bidding documents, costs estimates, etc.
- Other HOME projects: the City conducted on-site inspections of all HOME rental projects during the period of affordability as required by §92.504(d).
- Other CDBG activities: the Community Development Manager, with assistance from the CDBG/HOME Coordinator, reviewed all CDBG activities prior to the commitment/expenditure of funds. This review included project eligibility per the Annual Action Plan, meeting a National Objective, appropriate use of funds, cost reasonableness, environmental review requirements, etc. Activities such as the Micro-enterprise Assistance Program and Code Enforcement that primarily pay staff costs were reviewed in an ongoing manner throughout the program year to ensure that stated goals were being met and activities being performed were eligible.
- Davis Bacon: the City consulted with contractors and partner agencies regarding the applicability of Davis Bacon and the program requirements. Staff will conducted site visits, employee interviews, and checked weekly payroll forms for accuracy for any projects that required Davis Bacon compliance.
- Fair Housing/Section 3 Compliance: The City ensured compliance with Fair Housing and Section 3 during the process of awarding grant agreements to selected agencies and throughout the program year. Documentation was maintained on efforts to support low- and moderate-income

residents.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The availability for review and public comment of the CAPER for the 2019 program year was advertised in the Cincinnati Enquirer on December 11, 2020. Public notices were also posted on the City's website and distributed through all of the City's marketing channels. Copies of the draft CAPER were available for review at the city offices of the City of Covington as well as the HOME Consortium cities of Ludlow, Newport, Bellevue and Dayton. Assistance was offered to those with limited English speaking capabilities or individuals with hearing or vision impairments. The fifteen-day comment period ended on December 27, 2020.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The City updated and expanded its program objectives for the 2020-2024 Consolidated Plan. These new goals and objectives included: Expand Homeownership Opportunities; Increase Affordable Homeownership Units; Increase Affordable Rental Units; Improve Existing Owner Occupied Housing; Improve Streets, Sidewalks and Public Facilities; Improve Parks and Recreational Facilities; Reduce and Prevent Crime; Provide Recreation and Education Opportunities; Increase Jobs through Economic Development; and Reduce Blighted Conditions.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

There are currently two HOME assisted rental projects that require ongoing inspections. Kings Crossing at 1128-32 Greenup Street is an affordable HOME rental project with 8 HOME assisted units and Lincoln Grant Scholar House at 834 Greenup Street is an affordable HOME rental project with 3 HOME assisted units.

King's Crossing was inspected per the City's established onsite monitoring schedule in 2018. There were no issues with the rental units or the common areas of the property. The property was in compliance with all housing codes and other applicable regulations.

Lincoln Grant Scholar was completed in 2017. The required inspections were completed prior to occupancy. There were no issues with the inspections of this property. This project is scheduled to be inspected and monitored in 2020.

Both properties will continue to be inspected at least once every 3 years during the remaining period of affordability.

Both projects submit annual reports outlining the occupancy status of the assisted units, the tenant income and the monthly rents.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

The City affirmatively marketed its HOME funded activities through various resources to ensure that the broadest possible audience was informed of the programs. Catholic Charities and the Brighton Center (HUD approved housing counseling agencies) provided homeownership education and counseling programs and disseminated information related to the Covington and HOME Consortium Homebuyer Assistance programs to their clients. Program information was also provided to CHDO partners, the

Northern Kentucky Human Rights Commission, the Disabilities Coalition of NKY and other non-profit partner agencies who had contact with underserved populations.

The Equal Housing Opportunity logo was displayed on all marketing materials. The City displayed and disseminated fair housing posters.

CHDO's and other developers utilizing HOME funds for housing development were required to submit affirmative marketing plans.

City Staff attended public functions like the Disability Coalition Conference, Veteran's Fair, Senior Expo, Old Timer's Celebration, NAACP Diversity Housing Fair and Annual Pride Parade to market HOME programs to minority and underserved populations.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

The City did not receive any HOME program income. The City recaptures HOME funds when units are sold or transferred prior to the completion of the affordability period. In these instances, the HOME recaptured funds are returned to the HOME Program account and utilized for new affordable housing projects.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

The City invested HOME and CDBG funds in the following activities to foster and maintain affordable housing:

Homebuyer Assistance Program: The City offered interest-free, deferred, forgivable loans to assist low-income homebuyers with lender required down payment and closing costs. This program's goal was to increase homeownership among low-income households and expand housing choice by allowing buyers to purchase homes throughout the Consortium member cities of Covington, Ludlow, Newport, Bellevue and Dayton.

CHDO Housing Development: A CHDO is a private nonprofit, community-based service organization that has achieved a special designation as a developer of affordable housing. The City of Covington partnered with CHDO's to complete affordable housing units for homeownership.

Owner-Occupied Housing Rehab: The City offered forgivable loans for low/mod income homeowners to address urgent home repair needs or to alleviate code enforcement cited exterior code violations. The City also administered a lead based paint hazard reduction program as a result of a new HUD grant award from the Office of Lead Hazard Control and Healthy Homes.

Upper Floor Residential Rehab Program: This program provided loans to property owners to create new affordable rental units in vacant, upper floor space in mixed-use buildings.